

I am against RM-10740 for the following reasons.

1. Restricting the bandwidth of SSB (J3E) and AM (A3E) emissions would adversely impact Amateur Radio experimentation, which is one of the important corner stones that justify the existence of the Amateur Radio Service.
2. It is well known that Part 97 presently provides several remedies, which allows the Enforcement Division of the FCC to curtail the operations of those stations causing co-channel interference.
3. Also, Part 97 presently provides guidelines for acceptable bandwidth for SSB (J3E) and AM (A3E) emissions based upon "good engineering practice". The FCC has "type accepted" numerous commercial transceivers such as the Kenwood TS-950 SDX, which has a 3 KHz. transmit bandwidth on SSB (J3E) and a 6 KHz, transmit bandwidth on AM (A3E). One can conclude that the Kenwood TS-950 SDX, or any other transceiver "type accepted" for the Amateur Radio Service meets the Commission's standard of "good engineering practice".
4. If the Commission adopted RM-10740, how would the Enforcement Division of the Commission enforce such a rule? The Commission would have to depend upon the reports of the ARRL Official Observers and other Amateur Radio Operators, who at the point of signal reception, on their receivers, could only estimate the SSB (J3E), or AM (A3E) transmit bandwidth of the received station. The only way that the true transmit bandwidth of a station can be determined is by conducting careful testing with a spectrum analyzer at the transmitting site. In absence of such on site testing at the transmitting site, the Enforcement Division of the Commission, would be inundated with unsubstantiated claims of stations allegedly operating with excessive bandwidth on a daily basis. It is doubtful that the Enforcement Division of the Commission has the manpower to investigate the transmit bandwidth of every alleged offender at the transmitter site with careful testing using a spectrum analyzer. The adoption of RM-10740 by the Commission would create an unnecessary enforcement nightmare for the Commission.
5. In the past, the Commission has rejected a similar proposal to restrict the transmit bandwidth of Amateur Radio Stations based upon the adverse affect that such a rigid rule would have upon Amateur Radio experimentation and the fact that the Commission recognized that Part 97 already has adequate provisions to effectively address co-channel interference complaints. RM-10740 does not adequately argue the need for the Commission to break with precedent.

In conclusion, I urge the Commission to reject RM-10740.

Sincerely,  
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